



COPY

DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

1356 Hansford Street
Charleston, WV 25301-1401

Gaston Caperton
Governor

John M. Ranson
Cabinet Secretary

July 13, 1994

David C. Callaghan
Director

Ann A. Spaner
Deputy Director

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Frances Wildenstein, Fleet Manager
Coyne Textile Services
P.O. Box 9097
Huntington, West Virginia 25704

Dear Mr. Wildenstein:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by representatives of the Chief from the Office of Waste Management. This report is based on the inspection conducted on April 20, 1994.

Please refer to the **Compliance Evaluation** section of the report for those violations discovered during the course of this inspection.

A copy of this report has been referred to the Civil and Administrative Enforcement Unit of this Section for further action, and also, a copy is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact Inspector P. L. Brown at (304) 256-6850.

Sincerely,

Thomas A. Fisher
Inspector Supervisor - Southern Unit
Compliance Monitoring/Enforcement
Office of Waste Management

kw

Enclosures

cc: Jean Sofield, U.S. EPA Region III
Mike Dorsey, Assistant Chief, CME
Civil and Administrative Enforcement Unit
P. L. Brown, Inspector
Robert B. Schaffer, Coyne Textile Services, NY
File

INSPECTION FACT SHEET

COMPANY NAME: Coyne Textile Services **ID#:** WVD052574753

MAILING ADDRESS: PO Box 9097
Huntington, WV 25704 **FACILITY TYPE:**

LOCATION: 1111 Vernon Street
Huntington, WV **COUNTY:** (99)Wayne

COMPANY CONTACT: Frances Wildenstein
Fleet Manager **HANDLING CODES:**

PHONE: (304) 429-5585

PURPOSE: Compliance Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management
Act, Chapter 20-5E and 40CFR, Parts 260-265.

LIST OF CHEMICALS:

[For Small Quantity Generators, list amount of waste, how it is handled and where it goes.]

D001/D018/D039----parts cleaner waste----16 gallons / 6 weeks----Safety Kleen

DATE INSPECTED: April 20, 1994

INSPECTORS: (1) P L Brown

(2) T A Fisher

(3)

DATE PREPARED: July 7, 1994

VIOLATIONS_X____

PREPARED BY: P L Brown

NO VIOLATIONS_____

COMPLIANCE EVALUATION INSPECTION

RE: Coyne Textile Services
1111 Vernon Street
Huntington, West Virginia
EPA Identification Number: WVD052574753

DATE INSPECTED: April 20, 1994

INSPECTED BY: P. L. Brown, WV DEP/OWM
Tom Fisher, WV DEP/OWM

REPORT BY: P. L. Brown

On April 20, 1994, this inspector and Tom Fisher, inspector supervisor, met with representatives of Coyne Textile Services (CTS) at the Huntington, West Virginia facility for the purpose of inspecting a recent fuel spill clean-up site. We met with Frances Wildenstein, fleet manager for CTS, Kevin Curl of Oil Spill Response Corporation, and David Dunlap of Ogden Environmental. The representatives were advised that this inspection would assess the facility's compliance with the West Virginia Hazardous Waste Management Act and the Regulations promulgated thereunder.

Initially the fuel spill had involved kerosene spilled from an above ground tank, later during soil removal and sampling, contractors had discovered that some of the soil contained chlorinated solvents such as those used in dry cleaning. These compounds, all or in part, were found in 12 different samples, collected at various depths, and were identified as tetrachloroethylene (PERC), 1,1,2-trichlorethane, methylene chloride, and chloroform. The samples were analyzed using method 8240. One sample location, number 7-2, contained concentrations of PERC which may exceed hazardous waste levels, and it is recommended that

The latter three compounds can be degradation products of PERC. While vinyl chloride was not detected, it is recommended that TCLP analysis also include this compound since it is normally the final product of the breakdown of PERC. The presence of hazardous waste constituents indicates the occurrence of disposal of hazardous waste at sometime in the past (noncompliance).

According to the preliminary site characterization performed by Ogden, CTS dry cleaned using perchloroethylene (PERC) from February 1985 to April 1985. The facility notified for generating D001 and F002 waste on September 24, 1986. During the inspection Mr. Wildenstein told us that the dry cleaning operation was shut down in December 1990. The facility was cited for hazardous waste violations involving waste PERC during a compliance evaluation inspection on June 25, 1991. Facility records indicate the last of this perchloroethylene waste (6,045 lbs. of F002) was removed from site on July 5, 1991 consisting of 6 drums of PERC sludge from the dry cleaning shut down, and 6 drums of PERC and water also from the shut down.

Solvent soaked rags from various customers were brought there for laundry until some time in 1991. At least one of the previous tenants, Mid-West Towel and Linen Services, Inc. which operated the site from 1982-1985, was also a dry cleaner and may have used PERC. The representatives said they did not know whether the AST containing the kerosene which spilled or the UST on the south side by the boiler room had ever been used for storage of anything else such as PERC or other solvent (area of concern). The representatives said the UST contains

supplemental fuel oil for the gas-fired boiler; however, it has been out of service since at least 1985. In addition, the representatives said they have not located any blueprints which would explain the presence/purpose of underground concrete slabs on the south side of the facility which were found during the fuel spill response.

On May 6, 1994 our office received a proposed schedule from Robert Schaffer, director of environmental affairs for CTS. I spoke to David Dunlap of Ogden shortly before receiving a report from him. He expressed concern that this company does not have complete records for this CTS facility and requested copies of maps and previous inspection reports that our office might have on file. At least one map in our file does differ in that it was originally prepared by Ogden in March 1992, but contains a later hand-drawn addition indicating the location of the dry cleaning operation inside the building just north of the boiler room. Mr. Dunlap and I also discussed the time-frame proposed in the work schedule--he said it may be too ambitious; however, everything is on schedule to date. On June 30, 1994 the Preliminary Site Characterization for the facility was received from Ogden Environmental. The next item on the work schedule is conducting further site investigations, roughly scheduled for August 15, 1994. Prior to this the facility is awaiting comments from WV DEP. TCLP analysis of sample areas which contained high levels of PERC and chloroform, and sampling of the UST and surrounding soil by the boiler room should be included in further site activities.

(CEI) Coyne Textile Services, 1111 Vernon Street, Huntington, WV
EPA ID# WVD052574753
April 20, 1994
Page 4

The noncompliance cited above is being referred to the
Administrative Enforcement Unit for further action.

COMPLIANCE EVALUATION

The following violation of the WV Hazardous Waste Management Regulations (hereinafter Regulations) was noted during this inspection.

1. Presence of hazardous waste constituents indicates the occurrence of disposal of hazardous waste at some time in the past, in violation of Section 8 of the Regulations. This will result in a change of status of the facility from Conditionally Exempt Small Quantity Generator (CESQG) to Treatment, Storage, Disposal Facility (TSD) until the documentation is received certifying that the disposal site has been remediated.

Concerns:

The following areas of concern were noted during this inspection:

1. Sample analysis by method 8240 indicates some compounds such as perchloroethylene and/or chloroform may still be present in the subsurface soil at hazardous waste levels. Further screening by TCLP analysis should be conducted to include perchloroethylene, chloroform, and vinyl chloride.
2. In the past many dry cleaners stored solvents in underground tanks. It is unknown whether or not the UST near the boiler room ever stored or is storing chlorinated solvents. Sampling of the contents of this tank and the subsurface soil adjacent to it is recommended.

3. The purpose of the buried concrete slabs is unknown as well as what is under them. Further sampling by Ogden proposes to develop this information.
4. Groundwater monitoring may or may not be required at this facility depending on the extent of subsurface contamination discovered during the next phase of sampling.



SAG
COPY

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DIVISION OF ENVIRONMENTAL PROTECTION

1356 Hansford Street
Charleston, WV 25301-1401

Gaston Caperton
Governor

John M. Ranson
Cabinet Secretary

November 21, 1994

David C. Callaghan
Director

Ann A. Spaner
Deputy Director

Bartley Bright
Coyne Textile Services
P.O. Box 9097
Huntington, West Virginia 25704-9097

Dear Mr. Bright:

Enclosed is a copy of the **Compliance Schedule Evaluation (CSE)** report completed on your facility by a representative of the Chief of the Waste Management Section. This report is based on the inspection conducted on August 15 and August 24, 1994.

The United States Environmental Protection Agency has been notified so that this report can become a permanent to the addition to the compliance history of this facility.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact Inspector P. L. Brown at 256-6850.

Sincerely,

Thomas A. Fisher
Inspector Supervisor - Southern Unit
Compliance Monitoring/Enforcement
Office of Waste Management

kw

Enclosure

cc: P. L. Brown, Inspector
Jean Sofield, U.S. EPA Region III
File
Civil and Administrative Enforcement

INSPECTION FACT SHEET

COMPANY NAME: Coyne Textile Services **EPA ID #:** WVD052574753

MAILING ADDRESS: P O Box 9097 **FACILITY TYPE:**
Huntington, WV 25704-9097

LOCATION: 1111 Vernon Street **COUNTY:** (099) Wayne

PHONE: 304-429-5587 **HANDLING CODES:**

FACILITY CONTACT: Bartley Bright

INSPECTION TYPE: Compliance Schedule Evaluation

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act,
Chapter 20-18, and 40 CFR Parts 260-265.

HAZARDOUS WASTES GENERATED:

(For Conditionally Exempt and Small Quantity Generators, list type of waste, amount generated, and how disposed.)

D039--soil contaminated with perchloroethylene dry cleaning solvent

DATE INSPECTED: August 15, 1994-August 24, 1994

INSPECTORS: (1) P L Brown

VIOLATIONS: To be determined later.

(2) D Cunningham

(3) T A Fisher

(4) J R Fredericks

DATE PREPARED: October 20, 1994

PREPARED BY: Penny L. Brown

INSPECTION REPORT

On various dates from August 15, 1994 to August 24, 1994, inspectors Penny Brown, Dave Cunningham, John Fredericks, and inspector supervisor Tom Fisher conducted Compliance Schedule Evaluation Inspections at Coyne Textile Services in Huntington, WV. Upon arrival we normally met Bartley Bright, plant manager, and Kris McCandless from Ogden Environmental and Energy Services, who had been previously advised of our intentions to inspect the facility during the scheduled sampling activity. The representatives were informed that this inspection would emphasize the facility's compliance with the WV Hazardous Waste Management Act and the Regulations promulgated thereunder.

Kris McCandless, environmental geologist, collected soil, oil, and groundwater samples as outlined in the work plan for the current phase of environmental site characterization under Consent Order HW-395-94. Proper procedures were followed for all phases of well drilling and installation, well development, and all sampling. Any changes in sample locations were agreed to by all parties prior to collection. All wells were fitted with locks. Air monitoring was conducted on the soil samples using a 10.2 eV photoionizer, an 11.8 eV photoionizer, and a flame ionization organic vapor analyzer.

Samples of oil, groundwater, and soil were split with WVDEP representatives Fisher and Brown. Of the split samples, three were delivered to REIC laboratory in Beaver, WV for analysis by method 8240. These samples were from soil augering on the south side of the building (Ogden sample #19), soil augering 6" deep on the north side of the building (Ogden sample #20-6), and groundwater from monitoring well #1. The second sample (Ogden sample #20-6, DEP #SN) was found to contain 0.026 mg/kg of tetrachloroethene. No method 8240 compounds (volatile organics) were detected in the other two samples.

While on site observing sampling, inspectors Cunningham and Brown noted that the facility disposes of potentially infectious waste (adult diapers, etc.) in dumpsters on the rear lot, as shown in photo 1. This is being referred to the Wayne County Sanitarian for further investigation.

We also noted that the facility was intentionally burning paper (receipt books, computer printouts, etc.) on site in two barrels located beside their trash dumpsters from August 19, 1994 to August 24, 1994 (see photos 2 & 3). Burning solid waste is in violation of the WV Solid Waste Management Act (Chapter 22-15). This has been referred to Office of Environmental Enforcement Inspector Charlie Morris for further action.

Also while on site inspectors Cunningham and Brown observed on two occasions, solvent soaked rags being brought to the facility by company vehicles. The first delivery consisted of two wire hoppers of duffel bags filled with solvent soaked rags which were placed by the fence on the back lot of the facility. According to Mr. Bright, these rags were awaiting pickup on Friday August 19 for transportation to Cincinnati, Ohio for cleaning. The solvent odor was very strong and noticeable from anywhere on the back lot. On Saturday August 20 the rags were still there. Since rain was forecast for Sunday I asked what happens to the rags when it rains. Employees of CTS said the rags are moved inside the garage area when it rains. Coyne employees said these particular rags would be moved inside at the end of the day to be cleaned Monday morning, that they were only outside because of the odor and the fire risk. The employees said customers are instructed to drain the rags in containers first so there are no free liquids, however there is still enough solvent in the rags to cause combustion. One employee said the rags have caught fire before, so now rags are delivered onto the back lot where they remain until they are moved inside on Saturday evening. The rags were not on the lot Monday. On Wednesday August 24 an entire truckload of hoppers filled with duffel-bags of solvent soaked rags (see photo 4) was brought to the facility and loaded directly into the building through a door on the north side of the building. The driver said these rags were brought from Cincinnati, Ohio for cleaning. This same driver said he was not aware of any rags being sent to Cincinnati for cleaning. Air monitoring with a 10.2 eV photoionizer detected levels between 1 and 5 units above background in the area inside the building where the hoppers were being staged. Late in the day when the laundry employees had left work, the entire building smelled strongly of solvent, and mild eye and throat irritation was experienced by this inspector when walking through the building.

Shortly after the sampling activity by Ogden at the site, the Huntington Sanitary Board found significantly high levels of solvent in the wastewater discharged by CTS to the city sewer. This could be a result of cleaning the solvent-soaked rags.

Additionally on Saturday, August 20 a cleaning company pressure washed Coyne's pickup and delivery vehicles on the lot. The garage mechanics present said vehicles are never washed by Coyne employees, that this cleaning company plugs off the sump outlet, recovers all of the wash water from the drain and takes it away for disposal. This sump is the facility's stormwater collection drain which discharges to Kraut's Creek. Coyne Textile Services, Huntington facility does not have a stormwater discharge permit according to Randy Sovic of WVDEP Office of Water Resources Industrial Waste Section. According to Sovic, discharging stormwater through a drain used to collect process rinsewater from washing the trucks would constitute discharge of industrial waste without a permit.

The draft site characterization for CTS Huntington has been received and reviewed. It contains detailed descriptions of the local geology, past history of the property, health risk characterization, and maps and charts showing groundwater flow direction in the shallow aquifer, soil boring locations, monitoring well locations and installation data, headspace monitoring results, soil sample results, surface water and groundwater sample results, UST sample results, and perchloroethylene degradation pathways. Analytical results and discussions are grouped by both analyte and sample medium.

Split samples that were analyzed by both WVDEP and Ogden appear to agree:

<u>WVDEP Sample #</u>	<u>Ogden Sample #</u>	<u>WVDEP PERC</u>	<u>Ogden PERC</u>
SS	CTS-19	ND(<5ppb)	5.5ppb
SN	CTS-20-6	0.026ppm (26ppb)	22ppb
MW-1	CTS-17	ND(<5ppb)	<1ppb to 1.1ppb(duplicate)

Concerns discussed briefly in the site characterization include:

- Chlorinated organics found in the soil borings for MW-3 (239ppb), the upgradient monitoring well, were higher than any soil borings for the other monitoring wells, and second highest on the entire site (only B-4, 13-15" was higher at 688ppb). No chlorinated organics were detected in the groundwater sample for MW-3 (detection limit of 1ppb).
- Total lead levels found in the soil borings for MW-3 (16.68ppm) were higher than lead levels in soil borings for MW-1 and MW-4. Total lead detected in the groundwater sample for MW-3 (1.6 ppb) was actually lower than any other groundwater sample collected at the site.
- Significant levels of BTEX compounds still exist in the area of the kerosene spill. No BTEX compounds were detected in any of the groundwater or surface water samples.
- The highest concentration of chlorinated organics on site (698ppb at B-4) occurs next to the UST. The chlorinated organics in sample B-4 consisted mostly of PERC (590ppb). This is not consistent with the sole chlorinated organic compound found in the UST product sample, trichloroethene at 4,100ppb. Chlorinated organics were not detected in the UST tank bottoms. The Ogden report recommends repeating the tank sampling. This inspector is in agreement with this plan, although the analysis this time should include TCLP for trichloroethene.
- The previously constructed deep well which extends into the bedrock aquifer is contaminated with PERC and all of its anaerobic decomposition products(TCE, DCE, and vinyl chloride), in levels which exceed WV Groundwater Protection Standards.
- Chlorinated organics were detected in the upper aquifer groundwater samples from MW-2 and MW-4, and in the surface water at the north outfall.
- Values for total lead in groundwater samples from MW-1 and MW-4 (30ppb and 32.4ppb respectively) were significantly higher than for MW-2 and MW-3 (4.8ppb and 1.6ppb respectively).

COMPLIANCE EVALUATION

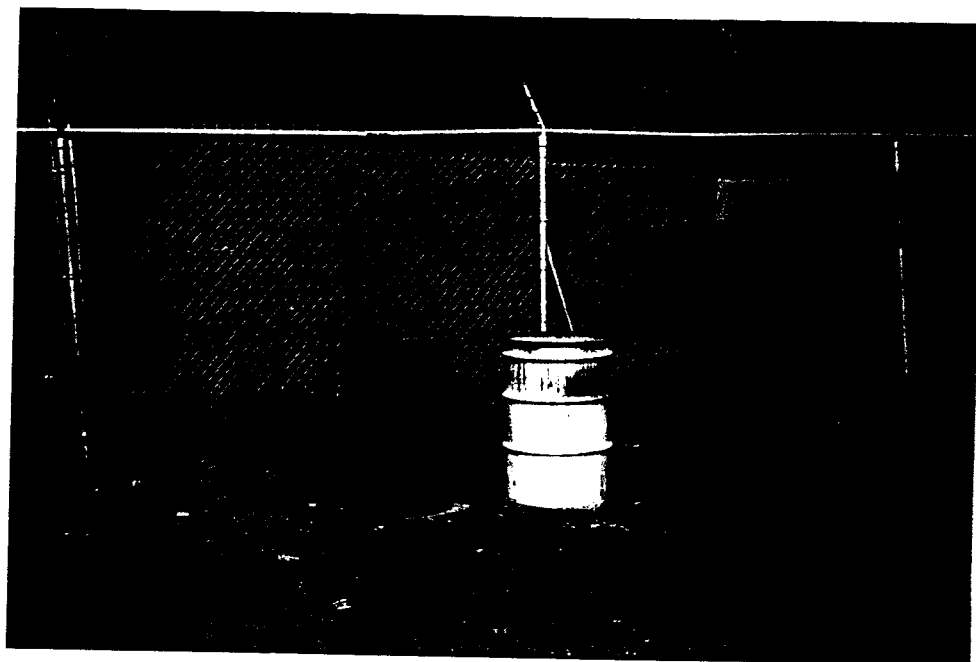
Non-Compliances:

- (1) Any violations of the WV Hazardous Waste Management Regulations will be determined and addressed separately upon completion of the site characterization.
- (2) Any areas of concern and / or violations of another agency's regulations are being referred to that agency for further action.

Concerns:

The following areas of concern were noted during this inspection:

- (1) The facility may be disposing of hazardous waste solvents by allowing evaporation of solvent from solvent-soaked rags.
- (2) The inconsistency between the trichloroethene found in the UST and the PERC found in the soil sample outside the tank warrants a repeat sampling of the tank contents. This analysis should include TCLP for trichloroethene.
- (3) There is still a significant amount of BTEX components in the soil in the area of the kerosene spill. Removal of more soil should be addressed.
- (4) The facility should continue to monitor groundwater contamination at this site.



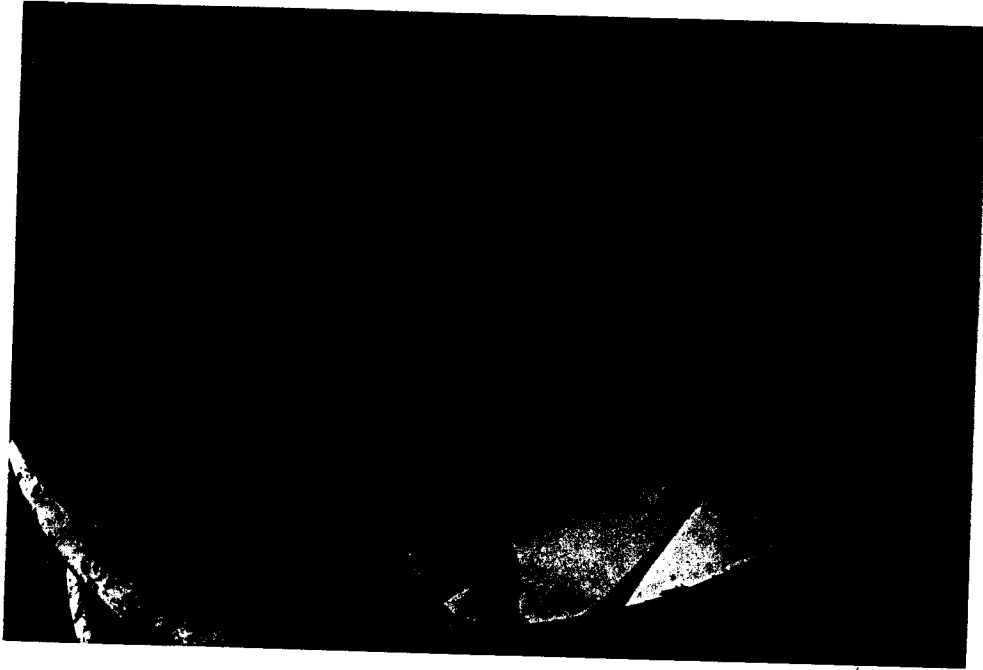


PHOTO LOG

Facility Name: Coyne Textile Services

Location: Huntington

1	2	3	4	5	6
1	Kodacolor Gold DX 200 Exp 4/95	fixed	sunny/hot	8/19/94	Bags of adult diapers and other hospital waste in solid waste dumpster on CTS lot.
2	" "	" "	" "	" "	Two barrels of paper receipt books and computer print-outs burning (covered but tops tilted open) on CTS lot beside solid waste dumpsters.
3	" "	" "	" "	" "	Close-up of burning contents of white barrel shown in photo 2.
4	" "	" "	" "	8/24/94	Hoppers of solvent soaked rags being unloaded into CTS building. Bags are visibly wet.

Photographer's Signature:

Phil Brown for D. Cunningham

1. Photo Number

2. Film Description

3. Focal Length/F-Stop/Shutter Speed

4. Weather

5. Date/Time

6. Description of Photo

FILM TURNED OVER TO: Foto 1--Charleston, WV

FOR DEVELOPING ON: 9-1-94

RECEIVED ON: 9-1-94



DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

1356 Hansford Street
Charleston, WV 25301-1401

Gaston Caperton
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John M. Ranson
Cabinet Secretary

David C. Callaghan
Director

Ann A. Spaner
Deputy Director

August 23, 1994

Mr. Robert B. Schaffer
Coyne Textile Services
P.O. Box 9097
Huntington, WV 25704

Certified Mail
Return Receipt Requested

WV D-52274 133

Dear Mr. Schaffer:

As the result of observations by hazardous waste inspectors during recent site visits at Coyne Textile Services, we view that the samples depicted and described on the attached map are essential to complete the preliminary site assessment. The same sampling protocol as previous sampling should be followed, and our hazardous waste inspectors must be present during the sampling.

Please be aware that this agency does have the authority under Chapter 22, Article 18, Section 14 of the West Virginia Code to take such samples and will do so, if necessary. Also, be assured that, unless additional environmental problems are evidenced by this sampling, this should be all of the preliminary sampling required. If you have any questions, contact Inspector Penny Brown or Inspector Supervisor Tom Fisher at their respective phone numbers in your possession.

Sincerely,

Carroll Cather

Carroll Cather, Unit leader
Compliance Monitoring and
Enforcement Section
Office of Waste Management

CC/ctf

cc: H. Michael Dorsey, CME Asst. Chief
Penny Brown, Inspector

[REDACTED]
Kris McCandless, Coyne Textile Services (Faxed)

NEED TO SAMPLE IN BACK OF BUILDING 22 YARDS FROM THE EAST CORNER OF THE WEST WING. ALSO, THREE SAMPLES FROM DITCH LINE ALONG RAILROAD TRACKS 8 YARDS FROM NORTH FACE OF BUILDING AT 30 YARD INTERVALS FROM NORTHWEST CORNER.

22 YARDS → ● ONE SAMPLING POINT

THIS SAMPLE POINT SHALL GO TO A DEPTH OF 8 FEET WITH SAMPLES TAKEN AT 2' INTERVALS.

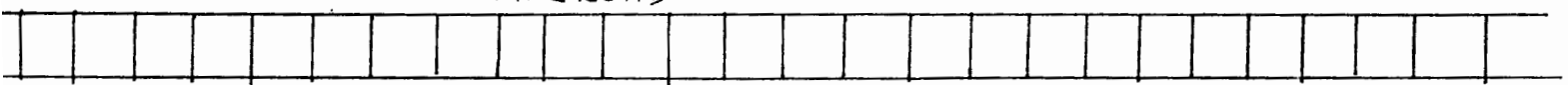
BUILDING

3 SAMPLING POINTS

THESE THREE POINTS SHALL INCLUDE SURFACE SOIL SAMPLE AND A SAMPLE AT SIX" DEPTH IN AREAS OF OBVIOUS STAINING

8 YARDS
 ↓ ↓ ↓
 (30 YARDS X 30 YARDS X 30 YARDS)

RAILROAD



EVALUATION-VIOLATION-ENFORCEMENT FORM

Handler ID Number

WVDC52574753

LDF[X]

TSF

INC

LOG

SOG

CEG[X]

TRA

Handler Name

COYNE TEXTILE SERVICES

FRANCES WILDENSTEIN

07 07 94

1111 VERNON STREET

HUNTINGTON

7-25-94

EVALUATION

Add

X

Change

Delete

Date

Number

Agency

Type

Reason

Branch

Person

04

20

94

S

CEI

CM

PLB

Areas of Evaluation (EV-Evaluated, NE-Not Evaluated, NA-Not Applicable)

GER

GPT

GBF

TWD

DGS

DLT

DPB

DWP

GGR

GRR

TGR

DCH

DGW

DMC

DPP

DBF

GLB

GSC

TMR

DCL

DIN

DMR

DSI

CAS

GMR

GSQ

TOR

DCP

DLB

DOR

DTR

FEA

GOR

GEX

TRR

DFR

DLF

DOT

DTT

CSS

Comments: CESOG WITH LAND DISPOSAL

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency

Number

Area

Date Determined

Agency

Number

Area

Date Determined

VIOLATION

Add

X

Change

Delete

Link to Above Evaluation?(Y/N)

Y

Agency

Number

Area

Class

Regulation Type

Regulation Citation

S

2

GSQ

1

SR

47CSR35 SECTION 11

Returned to Compliance

ref. adm. inf. 7-13-94

Date Determined

Priority

Branch

Person

Scheduled

Actual

04

20

94

CM

PLB

Comments: CESOG WITH LAND DISPOSAL--VIOLATION IS OF SECTION 12, EFFECTIVE JUNE 1, 1994

VIOLATION

Add

Change

Delete

Link to Above Evaluation?(Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Returned to Compliance

Date Determined

Priority

Branch

Person

Scheduled

Actual

Comments:

VIOLATION

Add

Change

Delete

Link to Above Evaluation?(Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Returned to Compliance

Date Determined

Priority

Branch

Person

Scheduled

Actual

Comments:

☐

=Required

☐

=Required if pert.

☐

=Req. for prev. reported data

☐

=Not required by EPA

Handler ID Number: Handler Name:

WID052574753

WINE TEXTILE SERVICES

VIOLATION: Add Change Delete

Agency: Number: Area: Class: Regulation Type: Regulation Citation:

Returned to Compliance

Date Determined: Priority: Branch: Person: Scheduled: Actual:

Comments:

VIOLATION: Add Change Delete

Agency: Number: Area: Class: Regulation Type: Regulation Citation:

Returned to Compliance

Date Determined: Priority: Branch: Person: Scheduled: Actual:

Comments:

VIOLATION: Add Change Delete Link to Above Evaluation (Y/N):

Agency: Number: Area: Class: Regulation Type: Regulation Citation:

Returned to Compliance

Date Determined: Priority: Branch: Person: Scheduled: Actual:

Comments:

ENFORCEMENT: Add ☒ Change Delete

Date: Number: Agency: Type: Branch: Person: Attorney:
07 07 94 S 120 CM PLB

Penalty Assessed: Settled:

POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION
PPE-Pollution Prevention ☐ EAE-Environmental Auditing ☐

PRE-Pollution Reduction ☐ EPE-Environmental Public Awareness ☐

ERE-Environmental Restoration ☐ (mark only one in this section)

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
S			04 20 94				

PENALTY PAYMENTS

Date	Amount	Date	Amount

Comments: REFERRED FOR ORDER